

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Case No.: 23-80101-CR-CANNON**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DONALD J. TRUMP,  
WALTINE NAUTA, and  
CAROLOS DE OLIVEIRA,

Defendants.

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**CERTIFICATION OF EMIL BOVE**

Emil Bove, Esquire, pursuant to Rule 4(b)(1) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certifies that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of the Bar of the State of New York; and (3) I have not filed more than three pro hac vice motions in different cases in this District within the last 365 days.

s/ Emil Bove  
Emil Bove